

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

KELSEY ROSE CASCADIA JULIANA, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil No. 6:15-cv-01517-TC
)	
UNITED STATES OF AMERICA, et al.,)	
)	
Federal Defendants.)	
_____)	

FEDERAL DEFENDANTS' MOTION TO DISMISS

Federal Defendants, by their undersigned counsel, hereby move pursuant to Rule 12(b), subsections (1) and (6), of the Federal Rules of Civil Procedure, for dismissal of the action with prejudice on the grounds of lack of jurisdiction over the subject matter and failure to state a claim upon which relief can be granted. The grounds for this motion are set forth in more detail in the memorandum and exhibits submitted herewith. A proposed Order is attached.

Respectfully submitted this 17th day of November, 2015.

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/s/ Justin A. Torres
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Attorneys for Federal Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November, 2015, a copy of the foregoing
FEDERAL DEFENDANTS' MOTION TO DISMISS was filed via the Court's electronic case
filing (ECF) system, which will send notice to all counsel of record.

/s/ Justin A. Torres
JUSTIN A. TORRES